

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

ALBERT L. GREEN,

Plaintiff,

v.

AMERICAN SAFETY RAZOR
COMPANY, LLC,

Defendant.

No.: 3:09-CV-254
Judge Jordan/Guyton
JURY DEMAND

MOTION FOR VOLUNTARY DISMISSAL

COMES NOW the Plaintiff, Albert Green, by and through counsel, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, and respectfully requests this Honorable Court to grant Plaintiff a voluntary dismissal without prejudice of his wrongful discharge claim pursuant to T.C.A. § 50-1-304. For grounds Plaintiff would state the Defendant will suffer no prejudice by the granting of said Motion.

WHEREFORE, for the reasons stated herein, Plaintiff respectfully requests this Honorable Court enter an Order dismissing without prejudice Plaintiff's claim for wrongful discharge pursuant to T.C.A. § 50-1-304.

RESPECTFULLY SUBMITTED this 29th day of January, 2010.

BURKHALTER, RAYSON & ASSOCIATES, P.C.

/s/ Ronald A. Rayson

David A. Burkhalter, II, BPR #004771

Ronald A. Rayson, BPR #013393

Attorneys for Plaintiff

111 S. Central Street

P.O. Box 2777

Knoxville, TN 37901-2777

(865) 524-4974

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document was served upon counsel of record by the Court's electronic filing system or by placing same in the United States Mail, postage prepaid, addressed as follows:

Charles E. Young, Jr., Esq.
KRAMER RAYSON LLP
P.O. Box 629
Knoxville, TN 37901-0629

Jeffrey S. Shapiro, Esq.
Jennifer M. Campbell, Esq.
McGuire Woods, LLP
One James Center
901 East Cary Street
Richmond, VA 23219-4030

This 29th day of January, 2010.

/s/ Ronald A. Rayson
Ronald A. Rayson